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April 8, 2016

Lawrence H. Norton

Via Email

Federal Election Commission
Office of Complaints Examination
and Legal Administration
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Washington, DC 20436

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Attention: Jeff S. Jordan, Assistant General Counsel, Complaints Examination & Legal
Administration (jjordan@fec.gov)
Donna Rawls, Paralegal (drawls@fec.gov)

Re: MUR 7014 and MUR 7017 -Request for Additional Extension

Dear Mr. Jordan and Ms. Rawls:

I write to request an additional 45-day extension (until June 2, 2016) to file a response on behalf of respondent, DE First Holdings, in the above-captioned matters. We learned earlier this week that the Commission has closed and publicly released its files in MURs 6485, 6487, 6488, 6711, and 6930, which arise from substantially similar allegations as are asserted against DE First Holdings and have been pending for up to five years. Three Commissioners have characterized these MURs as presenting issues of first impression.

The release of these five closed files effectively takes us back to square one. The requested extension is necessary to (1) review and analyze the files, which consist of approximately 350 pages and conflicting Statements of Reasons, (2) discuss the closed files with our client, (3) obtain and review pertinent documents and interview appropriate parties, in view of the analyses and disposition of the closed MURs, and (4) prepare and submit a written response to the Commission.

Thank you for your consideration. Please contact me at the above phone number or email address if you have any questions.

Respectfully submitted,



Lawrence H. Norton